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United States Environmental Protection Agency (EPA)
Region 2
290 Broadway
New York, NY 10007-1866
Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): JEFF BLAIR **DATE:** 05/19/15

SIC CODE: **ICIS #:**

I. Location of Tank(s) ☐ Tribal

Facility Name: SITE # 34170
Street Address: 9 ST. GEORGE AVE WEST
City: LINDEN, State: NY Zip Code: 07036
County: UNION
Phone Number: (908) 486-1127 Fax Number:
Contact Person(s): EDGAR AMADOR, ENV. COMP. SPECIALIST

II. Ownership of Tank(s) ☐ same as location (I.)

Owner Name: NJ ENERGY CORP.
Street Address: 536 MAIN STREET
City: NEW PALTZ, State: NY Zip Code: 12561
County:
Phone Number: (845) 256-0162 Fax Number:
Contact Person(s): SCOTT PARKER, DIRECTOR OF

IIA. Ownership of Other Facilities

☐Do you own other UST Facilities (Yes) / No

If Yes, How many Facilities 210 How many USTs 699

III. Notification

☐ Notification to implementing agency; name NJ DEP (EFFECTIVE THROUGH 06/30/15)
State Facility ID # NJ 008664

IV. Financial Responsibility

☐ State Fund
☐ Guarantee ☐ Surety Bond ☐ Private Insurance: Insurer/Policy #
☐ Local Government ☐ Self Insured ☐ Letter of Credit
☐ **Not Required** (Federal & State government, hazardous substance USTs)

V. Release History N/A ☑

☐ To your knowledge, are there any public or private Drinking Water Wells in the vicinity ? Yes / (No)

☐ Evidence of release or spills at facility ☐ Greater than 25 gallons (estimate)
☐ **Releases reported to implementing agency; if so, date(s)** [280.53]
☐ Release confirmed; when and how
☐ Initial abatement measures and site characterization ☐ Free product removal
☐ Soil or ground water contamination ☐ Corrective action plan submitted
☐ Remediation ongoing ☐ Remediation completed, no further action; date(s)

Notes:

NJ 0088644

VI. Tank Information — Tank No.	E1	E2	E3			
Tank presently in use	YES →		→			
If not, date last used (see Section XII)						
If empty, verify 1" or less left (see Section XII)						
Capacity of Tank (gal)	10,000 G	8000 G →				
Substance Stored	REG GAS →		PREM GAS			
M/Y Tank ~~installed~~ / Upgraded	01/90 →					
Tank Construction: Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)	FRP →					
Spill Prevention	SPILL	BUCKETS →				
Overfill Prevention (specify type)	BALL	FLOAT VALVES →				
Special Configuration: Compartmentalized , Manifolded	NO →					

VII. Piping Information

Piping Type: Pressure, Suction	PRESSURE →					
Piping Construction: Bare steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW)	FRP →					

Tank and Piping Notes: ✓

VIII. Cathodic Protection

N/A ☐ ✓

Integrity Assessment conducted prior to upgrade							
Interior Lining:	Interior lining inspected						
Impressed Current	CP Test records						
	Rectifier inspection records						
Sacrifical Anode:	CP test records	↓	↓	↓			

CP Notes: ✓

Tank No.	E1	E2	E3				
IX. UST system used solely by Emergency Power Generator	NO →						

X. Release Detection N/A ☐

Tank RD Methods	ATG	YES →						
	Interstitial Monitoring							
	Groundwater Monitoring							
	Vapor Monitoring							
	Inventory Control w/ TTT							
	Manual Tank Gauging							
	Manual Tank Gauging w/ TTT							
	SIR							
12 Months Monitoring Records (*Must* Make Available Last 12 Months For Compliance)		YES →						

Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED TWELVE PREVIOUS MONTHS OF PASSING CSLD RESULTS

TANK MONITOR → SIMPLICITY (VEEDER ROOT)

Pressurized Piping RD Methods		N/A ☐						
	Interstitial Monitoring							
	Groundwater Monitoring							
	Vapor Monitoring							
	SIR							
12 Months Monitoring Records								
USING ELLD	Annual Line Tightness Test	YES →						
ATLD	Present	YES →						
	Annual Test	YES →						

Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED PASSING LINE AND LEAK DETECTOR TEST RESULTS

TEST DATES → 09/25/14 AND 10/02/14

XI. Repairs

N/A ☑

Repaired tanks and piping are tightness tested within 30 days of repair completion	Y ☐ N ☐ Unknown ☐
CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system	Y ☐ N ☐ Unknown ☐
Records of repairs are maintained	Y ☐ N ☐ Unknown ☐

XII. Temporary Closure

N/A ☑

CP continues to be maintained	Y ☐ N ☐ Unknown ☐
UST system contains product and release detection is performed	Y ☐ N ☐ Unknown ☐
Cap and secure all lines, pumps, manways	Y ☐ N ☐ Unknown ☐

Notes:

Init/Date JKB 05/19/15

NJC003664

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST PROGRAM
Underground Storage Tank Team
New York, NY 10007-1866

Facility Name	STR #34170
Address	9 ST GEORGE AVE W, LINDEN
UST Reg #	NJ 008664

Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

☑ No violations observed at the conclusion of this inspection.

☐ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Potential Violations Observed:

Regulatory Citation	Violation Description
§	
§	
§	
§	
§	
§	
§	
§	

Actions Taken:
☐ Field Citation; # _____ ☐ Additional information required ☐ On-site request/Due date _____

Comments/Recommendations:

Name of Owner/Operator Representative:

Edgar Arevalo
(Please print)

(Signature)

Other Participants: _____

Name of EPA Inspector/representative

JEFFREY K. BLAIR
(Please print)

Jeffrey K Blair
(Signature)

(Credential Number)

Date of Inspection 05/19/15 Time 11:30 AM/PM

Init/Date JKB 05/19/15

SITE DRAWING

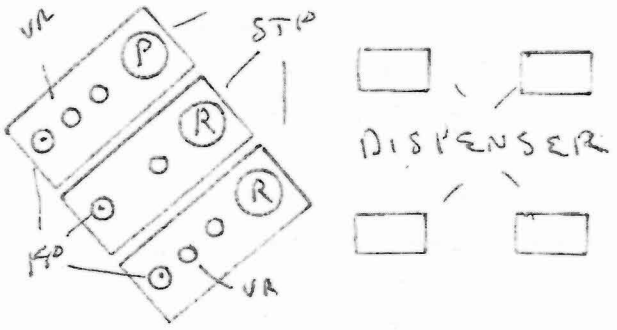
DATE: 05/19/15 TIME ON SITE: 11:00 AM TIME OFF SITE: 11:30 AM

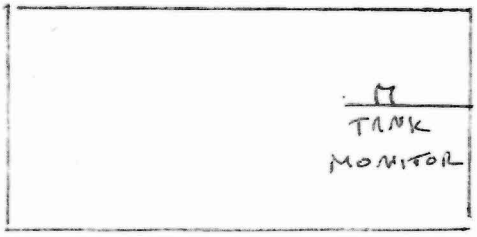
WEATHER: 70° + SLIGHTLY RAINING

ENVIRONMENTALLY SENSITIVE AREA : Y ☐ N ☑
If "Yes", please describe:

GPS ATOP USTS:

40.63807 'N
-74.26381 'W





PHOTOS

222 FP
223 STP
224 FP
225 STP
226 FP
227 STP
228 FUEL PAD
229 TANK MONITOR
230 INSIDE DISPENSER
231 SITE

☐ Pictures

Init/Date JK 05/19/15

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection? NO

Deficiencies observed: (Put an **X** for each observed deficiency)

___ Potential failure to complete or submit a notification, report, certification, or manifest

___ Potential failure to follow or develop a required management practice or procedure

___ Potential failure to maintain a record or failure to disclose a document

___ Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

___ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? **Yes / No**

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? **Yes / No**

If yes, what actions were taken?

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? **Yes / No**

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? **Yes / No**

Init/Date JLS 05/19/15

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		✓	
		☐ Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] ☐ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)] ☐ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] ☑ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	✓		
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]	✓		
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]	✓		
		☐ UST system (Choose one) ☐ UST in operation ☐ UST in temporary closure ☐ CP System is properly operated and maintained ☐ CP system is performing adequately based on results of testing. [280.31(b)]; - or - ☐ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance? N/A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]		✓	
		☐ Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected.			
		For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]:			
		☐ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)]	INSTALL DATE LISTED AS 01/80		
		☑ Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)]			
		☐ Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)]			
		For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: ☐			
		Tank and piping meet new UST requirements [280.21(a)(1)]			
		☐ Steel tank is internally lined. [280.21 (b)]			
		☐ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A - Indicates that the measure is not applicable.
Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Release Detection Compliance Measures Matrix

Instructions - To Determine Compliance Status of Measures #1-7,
Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance? N/A	Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		✓	
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		✓	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	✓		
		☐ Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]		✓	
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	✓		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]	✓		

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☐			**A. Inventory Control with Tank Tightness Testing (T.T.T)** ☐ Inventory control is conducted properly. ☐ T.T.T. performed as required (See "D" below). ☐ Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] ☐ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] ☐ Water is monitored at least monthly. [280.43(a)(6)]

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☑			**B. Automatic Tank Gauge (ATG)** ☑ ATG is set up properly. [280.40(a)(2)] ☑ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
☐			**C. Manual Tank Gauging (MTG)** ☐ Tank size is appropriate for using MTG. [280.43(b)(5)] ☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐ Method is being conducted correctly. [280.43(b)(4)] ☐ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
☐	☑	☐	**D. Tightness Testing** (Safe Suction piping does not require testing) ☐ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] ☑ Tightness testing is conducted within specified time frames for method: ☐ **Tanks** - every 5 years [280.41(a)(1)] ☑ **Pressurized Piping** - annually [280.41(b)(1)(ii)] ☐ **Non-exempt suction piping** - every 3 years [280.41(b)(2)] ☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
☐	☐	☐	**E. Ground Water or Vapor Monitoring** ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐ Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐ Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
☐	☐	☐	**F. Interstitial Monitoring** ☐ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ☐ Sensor properly positioned. [280.40(a)(2)]

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank (Choose one)	**Pressurized Pipe** (Choose Two)	**Non-exempt Suction Pipe** (Choose one)	**Release Detection Method**
	☑		**G. Automatic Line Leak Detector (ALLD)** ELLD ☑ ALLD is present and operational. [280.44(a)] ☐ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
☐	☐	☐	**H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]** ☐ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or ☐ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)] ☐ S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

Notes: N/A - Indicates that the measure is not applicable.
Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.
In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

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NJ 003664

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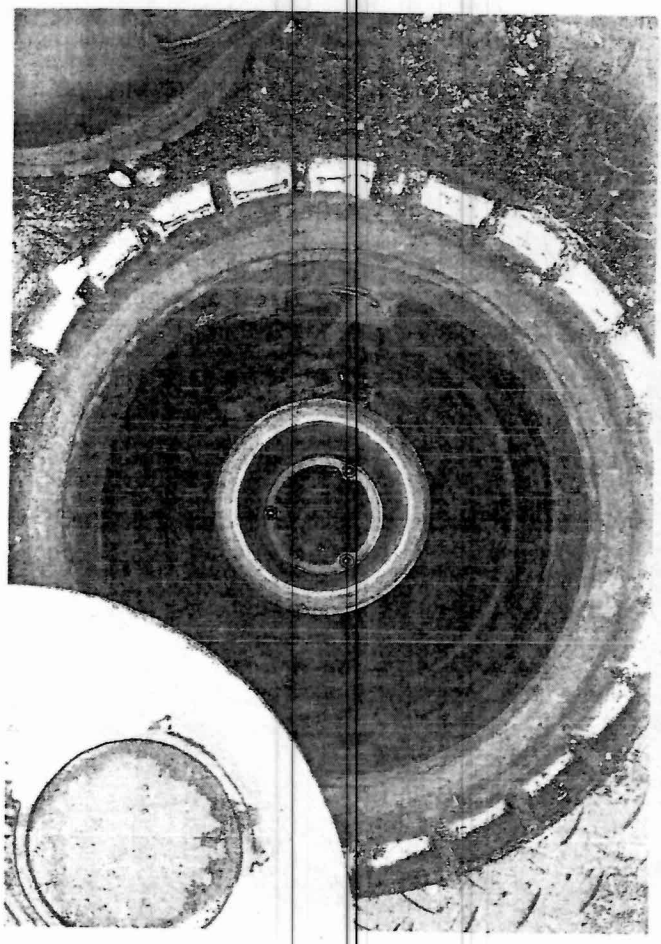

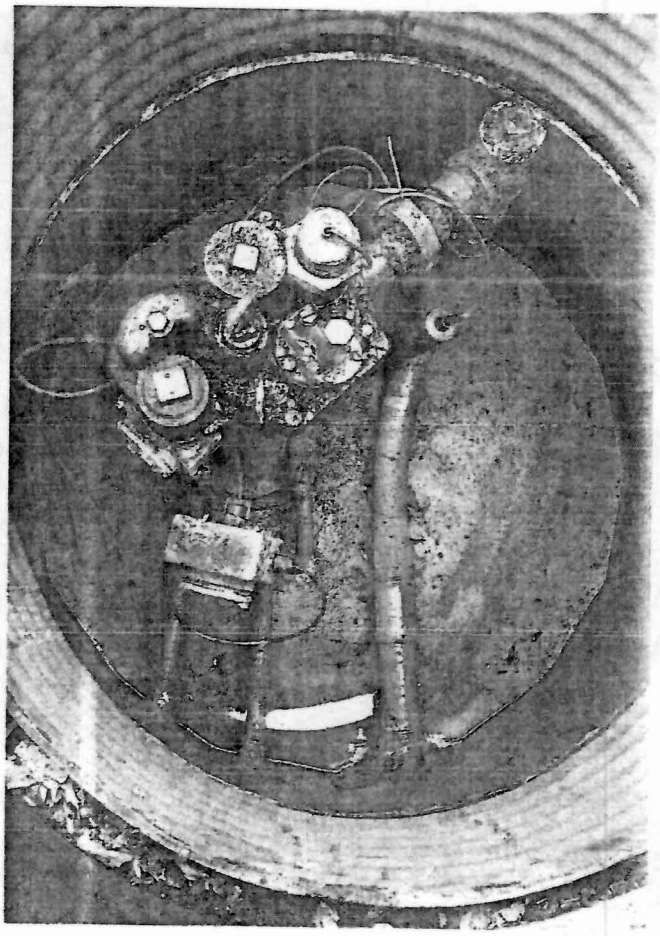

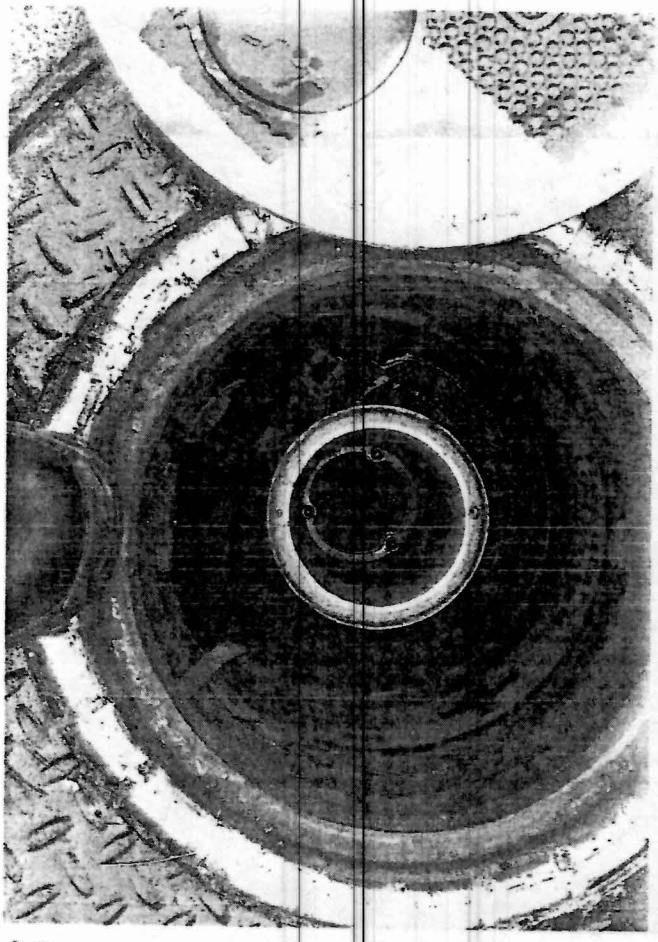

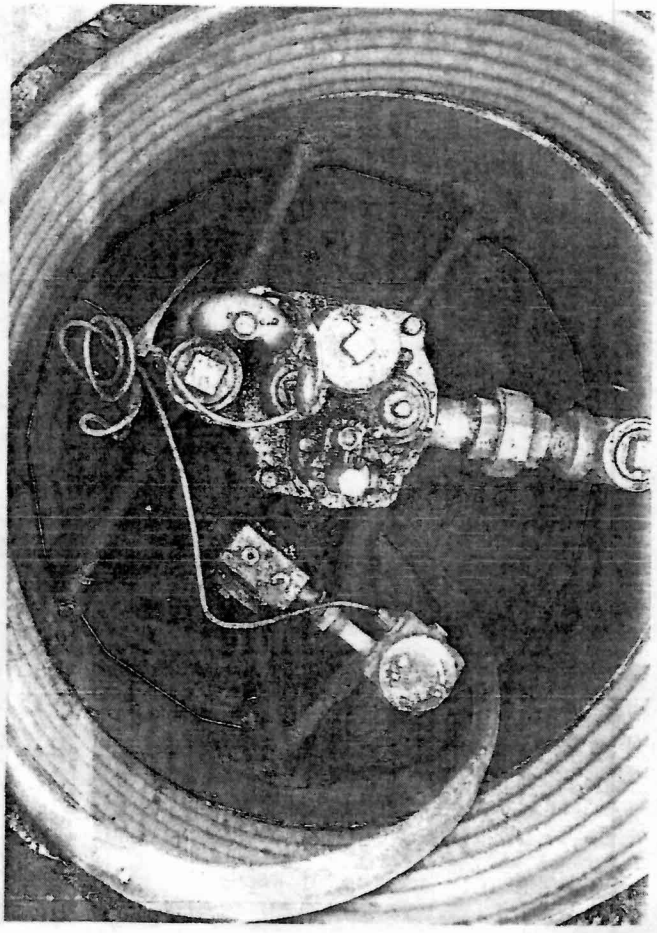

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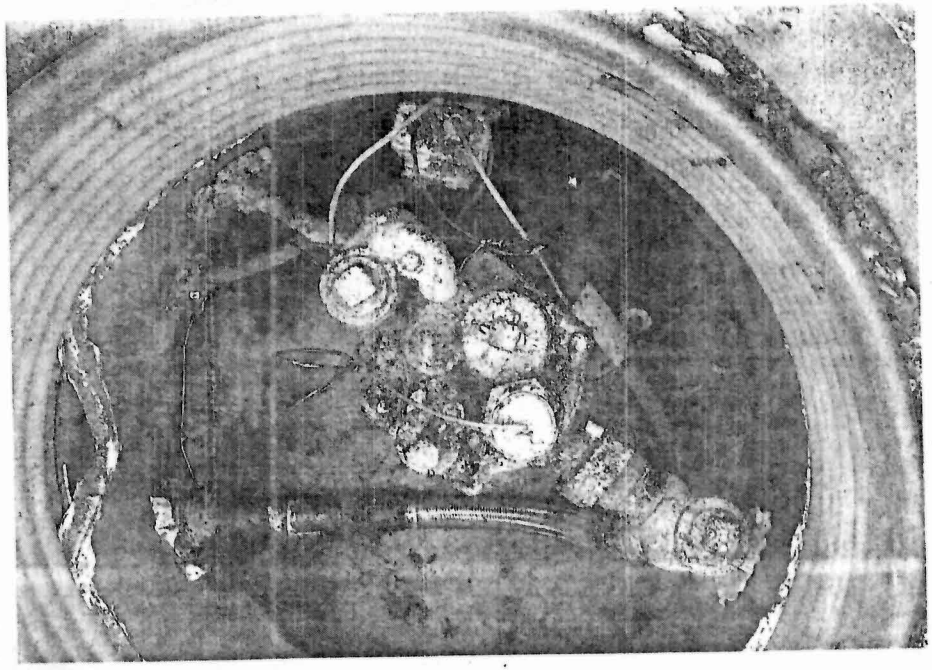
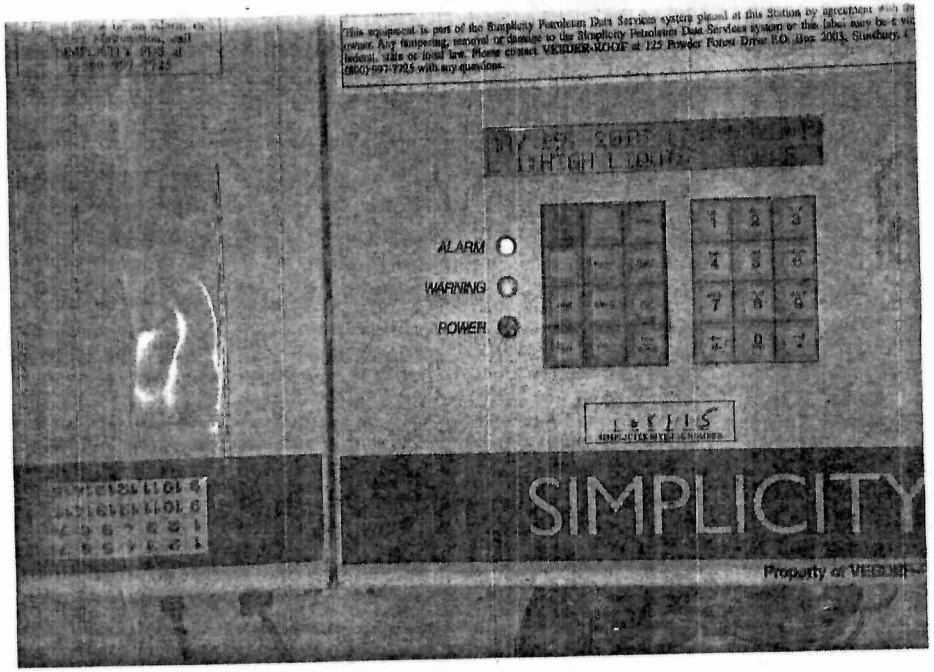
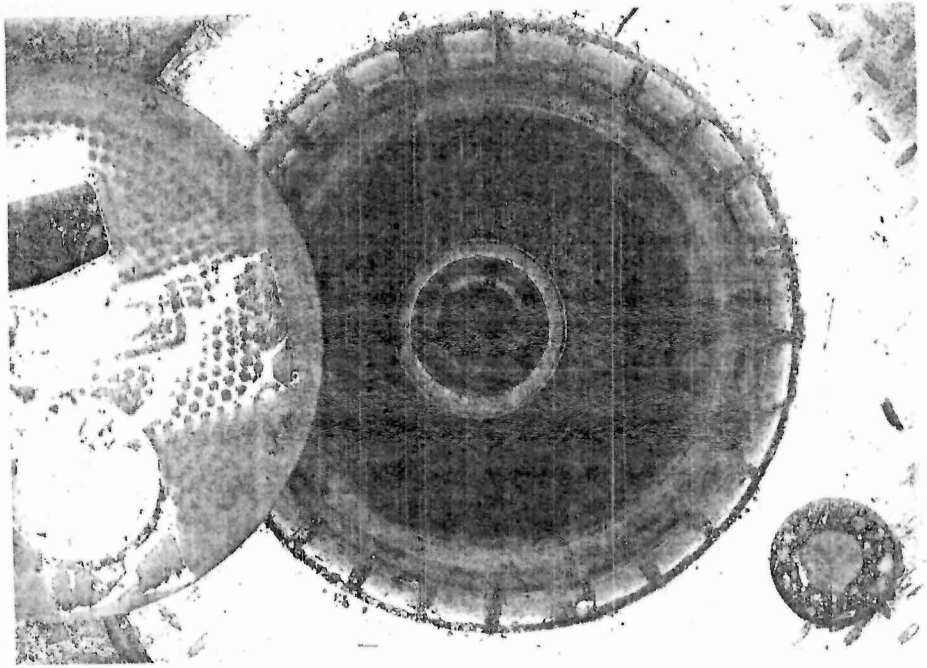
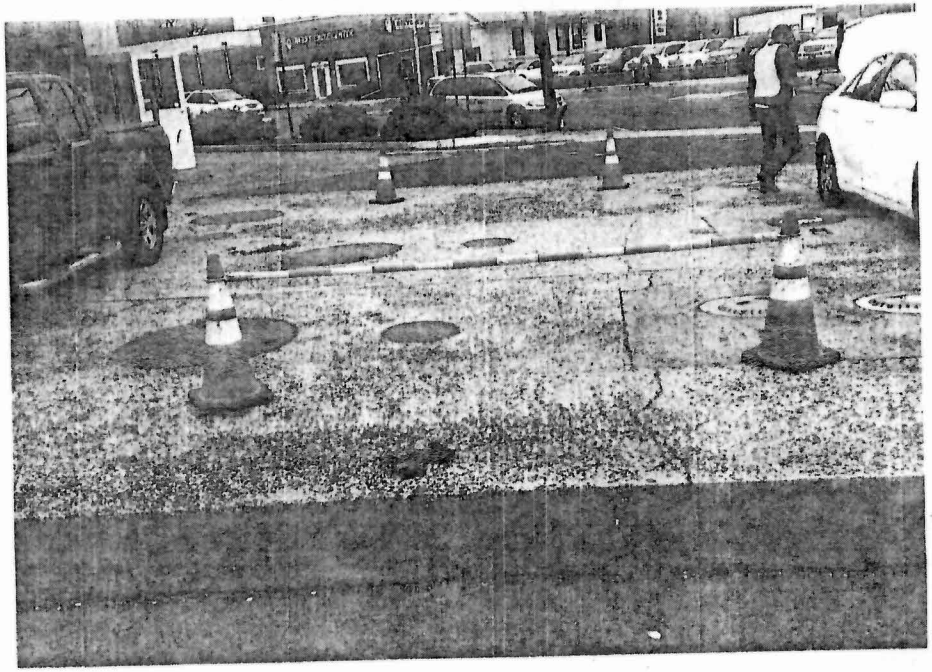



ALARM
WARNING
POWER
SIMPLICITY





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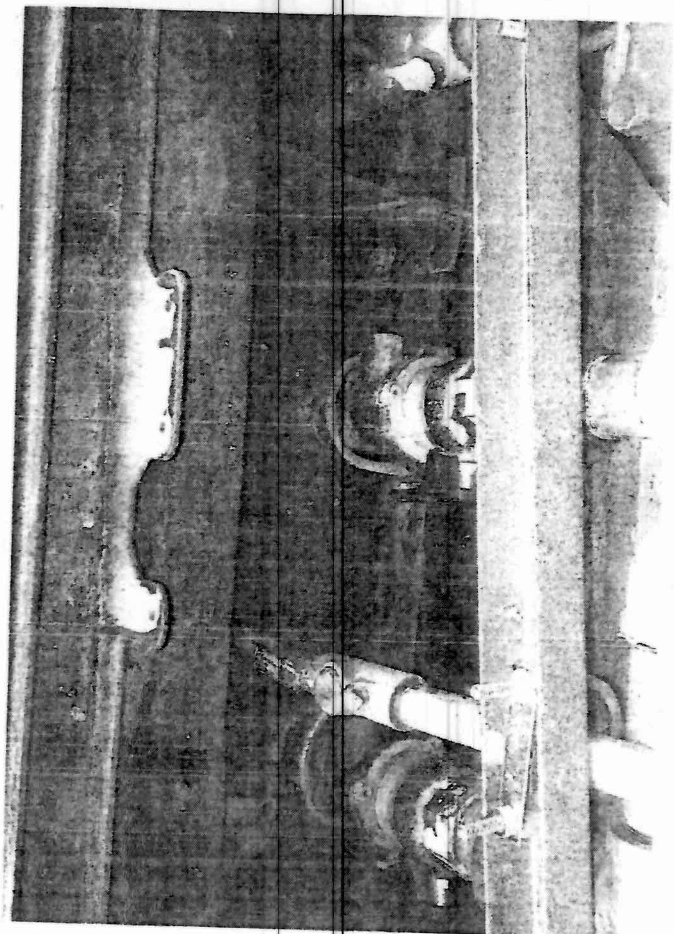
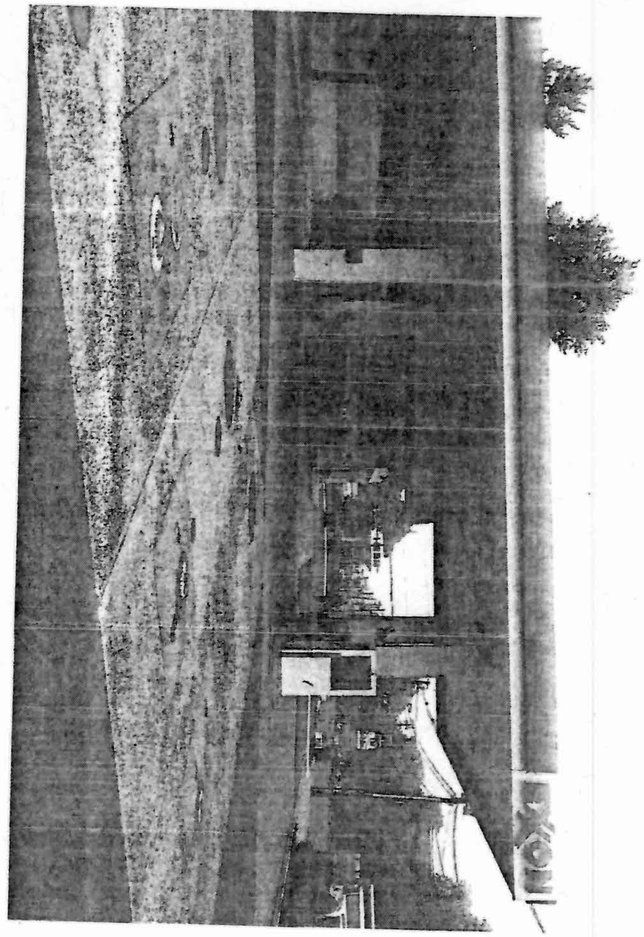




003644

United States Environmental Protection Agency (EPA)
Region 2
290 Broadway
New York, NY 10007-1866
Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): JEFF BLAIR **DATE:** 10/03/12

SIC CODE: **ICIS #:**

I. Location of Tank(s) ☐ Tribal	**II. Ownership of Tank(s)** ☐ same as location (I.)
Facility Name: NJ ENERGY CORP #34170	Owner Name: NJ ENERGY CORP.
Street Address: 9 ST. GEORGE AVENUE WEST	Street Address: 536 MAIN STREET
City: LINDEN, State: NJ, Zip Code: 07036	City: NEW PALTZ, State: NY, Zip Code: 12561
County: UNION	County: UNION
Phone Number: Fax Number:	Phone Number: (845) 256-0162 Fax Number:
Contact Person(s): EDGAR AMADOR, ENV. COMP. SPECIALIST	Contact Person(s): SCOTT PARKER, DIRECTOR FACILITIES

IIA. Ownership of Other Facilities

☐Do you own other UST Facilities Yes / No

If Yes, How many Facilities 34 How many USTs 112

III. Notification

☐ Notification to implementing agency; name NJ DEP (EFFECTIVE THROUGH ?) AWAITING CURRENT REGISTRATION
State Facility ID # 003664

IV. Financial Responsibility CHARTIS SPECIALTY INSURANCE CO.

☐ State Fund
☐ Guarantee ☐ Surety Bond
☐ Local Government ☐ Self Insured
☐ Private Insurance: Insurer/Policy # ST 584-4233
☐ Letter of Credit
☐ **Not Required** (Federal & State government, hazardous substance USTs)

V. Release History N/A ☑

☐ To your knowledge, are there any public or private Drinking Water Wells in the vicinity ? Yes / No

☐ Evidence of release or spills at facility ☐ Greater than 25 gallons (estimate)
☐ **Releases reported to implementing agency; if so, date(s)** _____ [280.53]
☐ Release confirmed; when and how _____
☐ Initial abatement measures and site characterization ☐ Free product removal
☐ Soil or ground water contamination ☐ Corrective action plan submitted
☐ Remediation ongoing ☐ Remediation completed, no further action; date(s)_____

Notes:

VI. Tank Information — Tank No.	E1	E2	E3			
Tank presently in use	NO	→	→			
If not, date last used (see Section XII)	2½ Mo	→	→			
If empty, verify 1" or less left (see Section XII)	NO	→	→			
Capacity of Tank (gal)	10,000 G	8000 G	→			
Substance Stored	GASOLINE	→	→			
M/Y Tank installed / Upgraded	01/90	→	→			
Tank Construction: Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)	FRP	→	→			
Spill Prevention	SPILL BUCKETS	→	→			
Overfill Prevention (specify type)	* NO *	→	→			
Special Configuration: Compartmentalized, Manifolded	NO	→	→			

VII. Piping Information

Piping Type: Pressure, Suction	PRESSURE	→	→			
Piping Construction: Bare steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW)	FRP	→	→			

Tank and Piping Notes:

NO VERIFICATION OF OVERFILL PREVENTION DEVICE(S)

COMMENT ADDED 10/15/12 → (SEE ATTACHED MEMO REGARDING OVERFILL PREVENTION)

VIII. Cathodic Protection

N/A ☐

Integrity Assessment conducted prior to upgrade							
Interior Lining: Interior lining inspected							
Impressed Current CP Test records							
Rectifier inspection records							
Sacrifical Anode: CP test records							

CP Notes:

Init/Date JKB 10/09/12

Tank No.	E1	E2	E3				
IX. UST system used solely by Emergency Power Generator	NO	→	→				

X. Release Detection N/A ☐

Tank RD Methods	ATG	YES	→	→				
	Interstitial Monitoring							
	Groundwater Monitoring							
	Vapor Monitoring							
	Inventory Control w/ TTT							
	Manual Tank Gauging							
	Manual Tank Gauging w/ TTT							
	SIR							
12 Months Monitoring Records (*Must* Make Available Last 12 Months For Compliance)		* NO *	→	→				

Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

NO HISTORICAL TANK RELEASE DETECTION RESULTS

TANK MONITOR PERFORMS CSLD RESULTS

TANK MONITOR → SIMPLICITY

Pressurized Piping RD Methods		N/A ☐						
	Interstitial Monitoring							
	Groundwater Monitoring							
	Vapor Monitoring							
	SIR							
12 Months Monitoring Records								
	Annual Line Tightness Test							
ALLD	Present	YES	→	→				
	Annual Test							

Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

NO RECENT LEAK DETECTOR OR PRESSURIZED LINE TEST RESULTS

TANK SYSTEMS TO BE TESTED SOON - INACTIVE SINCE PURCHASE (MAR - JULY 2012)

XI. Repairs

N/A ☑

Repaired tanks and piping are tightness tested within 30 days of repair completion	Y ☐ N ☐ Unknown ☐
CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system	Y ☐ N ☐ Unknown ☐
Records of repairs are maintained	Y ☐ N ☐ Unknown ☐

XII. Temporary Closure

N/A ☐

CP continues to be maintained	Y ☐ N ☐ Unknown ☐ ☑ N/A
UST system contains product and release detection is performed	Y ☐ N ☑ Unknown ☐
Cap and secure all lines, pumps, manways	Y ☐ N ☑ Unknown ☐

Notes: ALL TANKS CONTAIN PRODUCTS

TANK MONITOR INDICATED TANK(S) CONTAIN: E1 → 3959 G
E2 → 3145 G
E3 → 1359 G

Init/Date JKB 10/08/12

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST PROGRAM
Ground Water Compliance Section
New York, NY 10007-1866

Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

☐ No violations observed at the conclusion of this inspection.

☐ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Violations Observed:

Regulatory Citation	Violation Description
§ 280.70(a)	FAILURE TO CONTINUE OPERATION AND MAINTENANCE OF
§	RELEASE DETECTION IN A TEMPORARILY CLOSED TANK SYSTEM
§	
§ 280.21(d)	FAILURE TO PROVIDE OVERFILL PREVENTION SYSTEM FOR AN
§	EXISTING TANK SYSTEM
§	
§	
§	

Actions Taken:
☐ Field Citation; # _____ ☐ Additional information required ☐ On-site request/Due date _____

Comments/Recommendations:

- NO HISTORICAL TANK OR PIPING RELEASE DETECTION RESULTS (PURCHASED FACILITY IN JULY 2012 - STILL TEMPORARILY ABANDONED)

- NO VERIFICATION OF OVERFILL PREVENTION SYSTEMS

Name of Owner/Operator Representative:

Edgar Arroyo
(Please print)

(Signature)

Other Participants: _____

Name of EPA Inspector/representative

JEFFREY K BLAIR
(Please print)

(Signature)

(Credential Number)

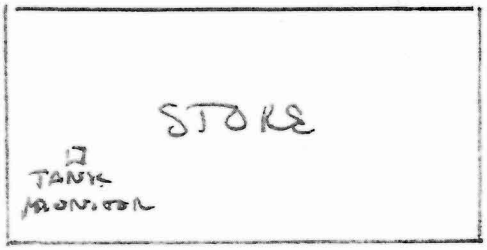
Date of Inspection 10/03/12 Time 9145 AM/PM

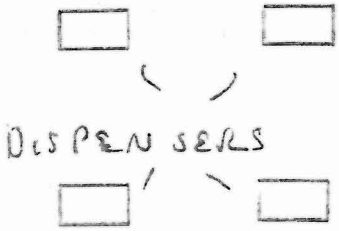
SITE DRAWING

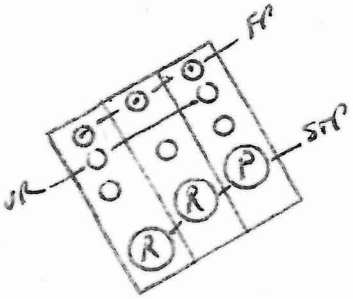
DATE: 10/03/12 TIME ON SITE: 9:20 AM TIME OFF SITE: 9:55 AM

WEATHER: 65° + OVERCAST

ENVIRONMENTALLY SENSITIVE AREA : Y ☐ N ☑
If "Yes", please describe:







PHOTOS

032 FP REG
033 STP REG
034 FP REG
035 STP REG
036 FP PRE
037 STP PRE
038 FUEL PAD
039 TANK MONITOR
040 SITE

☐ Pictures

Init/Date JKB 10/03/12

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection? YES

Deficiencies observed: (Put an **X** for each observed deficiency)

___ Potential failure to complete or submit a notification, report, certification, or manifest

X Potential failure to follow or develop a required management practice or procedure

X Potential failure to maintain a record or failure to disclose a document

X Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

___ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? (Yes) / No

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? (Yes) / No

If yes, what actions were taken? (2) WILL FORWARD OVERFILL PREVENTION VERIFICATION AND WILL EMPTY TANKS OR ACTIVATE STATION ASAP

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? (Yes) / No

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? (Yes) / No

COMMENT ADDED 10/15/12. → SEE ATTACHED MEMO REGARDING OVERFILL PREVENTION

Init/Date JKB 10/03/12

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]			✓
		☐ Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)]			
		☐ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)]			
		☐ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)]			
		☐ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	✓		
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(c)]	✓		
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]	✓		
		☐ UST system (Choose one)			
		☐ UST in operation			
		☐ UST in temporary closure			
		☐ CP System is properly operated and maintained			
		☐ CP system is performing adequately based on results of testing. [280.31(b)]; - or -			
		☐ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

Release Detection Compliance Measures Matrix

Instructions - To Determine Compliance Status of Measures #1-7,
Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance? N/A	Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		✓	
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		✓	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	✓		
		☐ Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]			✓
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	✓		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]	✓		

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☐			**A. Inventory Control with Tank Tightness Testing (T.T.T)** ☐ Inventory control is conducted properly. ☐ T.T.T. performed as required (See "D" below). ☐ Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] ☐ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] ☐ Water is monitored at least monthly. [280.43(a)(6)]

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]		✓	
		☐ Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected. For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]: ☐ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)] ☑ Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)] (TANK INSTALLATION DATE LISTED AS 01/80) ☐ Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)] For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: ☐ Tank and piping meet new UST requirements [280.21(a)(1)] ☐ Steel tank is internally lined. [280.21 (b)] ☐ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A - Indicates that the measure is not applicable.
Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☐			**B. ~~Automatic Tank Gauge (ATG)~~** ☐ ATG is set up properly. [280.40(a)(2)] ☑ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
☐			**C. Manual Tank Gauging (MTG)** ☐ Tank size is appropriate for using MTG. [280.43(b)(5)] ☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐ Method is being conducted correctly. [280.43(b)(4)] ☐ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
☐	☐	☐	**D. Tightness Testing** (Safe Suction piping does not require testing) ☐ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] ☐ Tightness testing is conducted within specified time frames for method: ☐ **Tanks** - every 5 years [280.41(a)(1)] ☑ **Pressurized Piping** - annually [280.41(b)(1)(ii)] ☐ **Non-exempt suction piping** - every 3 years [280.41(b)(2)] ☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
☐	☐	☐	**E. Ground Water or Vapor Monitoring** ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐ Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐ Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
☐	☐	☐	**F. Interstitial Monitoring** ☐ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ☐ Sensor properly positioned. [280.40(a)(2)]

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
	☐		**G. Automatic Line Leak Detector (ALLD)** ☑ ALLD is present and operational. [280.44(a)] ☐ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
☐	☐	☐	**H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]** ☐ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or ☐ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)] ☐ S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

2012 10 03 09 29
X1

2012 10 03 09 29

2012 10 03 09:29

2012 10 03 09:30

2012.10.03 09:30

2012.10.03 09:30

SIMPLICITY
Property of WEBER-RICOT
ALARM
WARNING
POWER
2012.10.03 09:33

2012.10.03 09:33

EXXON
2012-10-03 09:53

015226

24

United States Environmental Protection Agency (EPA)
Region 2
290 Broadway
New York, NY 10007-1866
Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): JEFF BLAIR **DATE:** 10/09/12

SIC CODE: **ICIS #:**

I. Location of Tank(s) ☐ Tribal

Facility Name: NJ ENERGY CORP # 30252
Street Address: 1175 PALISADES AVENUE
City: FORT LEE State: NJ Zip Code: 07024
County: BERGEN
Phone Number: (201) 224-6425 Fax Number: JOSEPH MCCORMICK, ENV. COMP. MGR, ENV. COMP.
Contact Person(s): EDGAR ARMADOR SPECIALIST

II. Ownership of Tank(s) ☐ same as location (I.)

Owner Name: NJ ENERGY CORP.
Street Address: ~~1175~~ 530 MAIN STREET
City: NEW PALTZ State: NY Zip Code: 12561
County:
Phone Number: (845) 256-5162 Fax Number:
Contact Person(s): SCOTT PARKER DIRECTOR - FACILITIES

IIA. Ownership of Other Facilities

☐Do you own other UST Facilities (Yes) / No

If Yes, How many Facilities 34 How many USTs 112

III. Notification

☐ Notification to implementing agency; name NJ DEP (EFFECTIVE THROUGH 12/31/13)
State Facility ID # 015226

IV. Financial Responsibility CHARTIS SPECIALTY INSURANCE CO.

☐ State Fund ☐ Private Insurance: Insurer/Policy # ST 584-4298
☐ Guarantee ☐ Surety Bond ☐ Letter of Credit
☐ Local Government ☐ Self Insured ☐ **Not Required** (Federal & State government, hazardous substance USTs)

V. Release History N/A ☑

☐ To your knowledge, are there any public or private Drinking Water Wells in the vicinity ? Yes / (No)

☐ Evidence of release or spills at facility ☐ Greater than 25 gallons (estimate)
☐ **Releases reported to implementing agency; if so, date(s)** _____ [280.53]
☐ Release confirmed; when and how _____
☐ Initial abatement measures and site characterization ☐ Free product removal
☐ Soil or ground water contamination ☐ Corrective action plan submitted
☐ Remediation ongoing ☐ Remediation completed, no further action; date(s) _____

Notes: ✓

015.226

VI. Tank Information — Tank No.	OE1	OE2	OE3			
Tank presently in use	YES →		→			
If not, date last used (see Section XII)						
If empty, verify 1" or less left (see Section XII)						
Capacity of Tank (gal)	12000 G →		→			
Substance Stored	GASOLINE →		→			
M/Y Tank installed / Upgraded	01/91 →		→			
Tank Construction: Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)	DW FRP →		→			
Spill Prevention	SPILL	BUCKETS →				
Overfill Prevention (specify type)	*NO* →		→			
Special Configuration: Compartmentalized, Manifolded	← MANIFOLDED →		NO			

VII. Piping Information

Piping Type: Pressure, Suction	PRESSURE →		→			
Piping Construction: Bare steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW)	DW FLEXIBLE PLASTIC →		→			

Tank and Piping Notes:

NO VERIFICATION OF OVERFILL PREVENTION DEVICE(S)

COMMENT ADDED 10/16/12 → SEE ATTACHED MEMO REGARDING OVERFILL PREVENTION

VIII. Cathodic Protection

N/A ☑

Integrity Assessment conducted prior to upgrade							
Interior Lining:	Interior lining inspected						
Impressed Current	CP Test records						
	Rectifier inspection records						
Sacrifical Anode:	CP test records						

CP Notes: ✓

Init/Date JKB 10/09/12

Tank No.	001	002	003				
IX. UST system used solely by Emergency Power Generator	NO →	→	→				

X. Release Detection

N/A ☐

Tank RD Methods	ATG	YES →	→	→				
	Interstitial Monitoring							
	Groundwater Monitoring							
	Vapor Monitoring							
	Inventory Control w/ TTT							
	Manual Tank Gauging							
	Manual Tank Gauging w/ TTT							
	SIR							
12 Months Monitoring Records	*(Must Make Available Last 12 Months For Compliance)*	YES →	→	→				

Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED 12/12 PREVIOUS MONTHS OF PASSING CSLD RESULTS FOR TANK 1 - REG UNL, 11/12 MONTHS OF PASSING CSLD RESULTS FOR TANK 2 - REG UNL + TANK 3 - PREMIUM (BOTH MISSING NOV-2011) TANK MONITOR → SIMPLICITY

Pressurized Piping RD Methods		N/A ☐						
	Interstitial Monitoring							
	Groundwater Monitoring							
	Vapor Monitoring							
12 Months Monitoring Records	SIR							
	Annual Line Tightness Test	YES →	→	→				
ALLD	Present	YES →	→					
	Annual Test	YES →	→	→				

Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED PASSING LEAK DETECTOR AND PRESSURIZED LINE TEST RESULTS

TANK MONITOR → SIMPLICITY

(TEST DATE → 07/24/12)

Init/Date JKB 10/09/12

XI. Repairs

N/A ☑

Repaired tanks and piping are tightness tested within 30 days of repair completion	Y ☐ N ☐ Unknown ☐
CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system	Y ☐ N ☐ Unknown ☐
Records of repairs are maintained	Y ☐ N ☐ Unknown ☐

XII. Temporary Closure

N/A ☑

CP continues to be maintained	Y ☐ N ☐ Unknown ☐
UST system contains product and release detection is performed	Y ☐ N ☐ Unknown ☐
Cap and secure all lines, pumps, manways	Y ☐ N ☐ Unknown ☐

Notes:

TANK MONITOR PRESENTLY IN ALARM
"INSTALL ALARM" DISPENSER 3-4
PAN SENSOR

Init/Date JKB 10/08/12

015224

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST PROGRAM
Ground Water Compliance Section
New York, NY 10007-1866

Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

□ No violations observed at the conclusion of this inspection.

□ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Violations Observed:

Regulatory Citation	Violation Description
§ 280.20 (c)	FAILURE TO USE AN OVERFILL PREVENTION SYSTEM
§	
§ 280.45	FAILURE TO MAINTAIN RECORDS OF RELEASE DETECTION
§	MONITORING
§	
§	
§	
§	

Actions Taken:
□ Field Citation; #_____ □ Additional information required □ On-site request/Due date _____

Comments/Recommendations:

- NO VERIFICATION OF OVERFILL PREVENTION DEVICE(S)
- PROVIDED ONLY 11/12 PREVIOUS MONTHS OF PASSING CSLD RESULTS ON 2/3 USTS

Name of Owner/Operator Representative:

JOSEPH MCCORMICK
(Please print)

(Signature)

Other Participants: _____

EDGAR AMADOR

Name of EPA Inspector/representative

JEFFREY K. BLAIR
(Please print)

Jeffrey K Blair
(Signature)

(Credential Number)

Date of Inspection 10/09/12 Time 1:15 AM/PM

Init/Date JKB 10/09/12

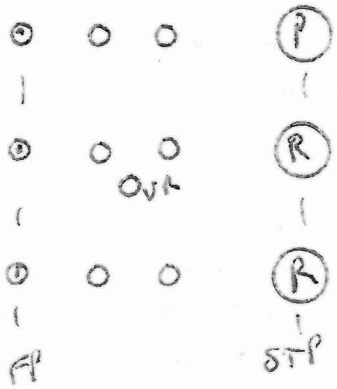
015226

SITE DRAWING

DATE: 10/09/12 TIME ON SITE: 12:40PM TIME OFF SITE: 1:15PM

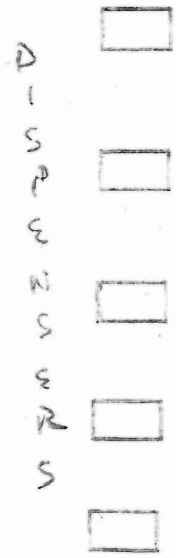
WEATHER: 65° + OVERCAST

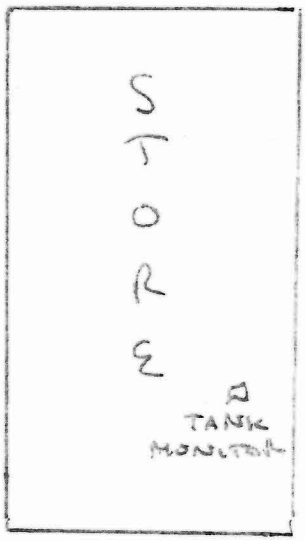
ENVIRONMENTALLY SENSITIVE AREA : Y ☐ N ☑
If "Yes", please describe:



PHOTOS

266 FUEL PAD
267 FP PRE
268 STP PRE
269 FP REC
270 STP REC
271 FP REC
272 STP REC
273 TANK MONITOR
303 SITE





☑ Pictures

Init/Date: JKB 10/09/12

CS15124

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection? Yes

Deficiencies observed: (Put an **X** for each observed deficiency)

X Potential failure to complete or submit a notification, report, certification, or manifest

Y Potential failure to follow or develop a required management practice or procedure

Y Potential failure to maintain a record or failure to disclose a document

Y Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

___ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? **Yes / No**

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? **Yes / No**

If yes, what actions were taken? (2) WILL FORWARD OVERFILL PREVENTION VERIFICATION (3) WILL SEARCH FOR MISSING MONTHLY CSLD RESULTS

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? **Yes / No**

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? **Yes / No**

COMMENT ADDED 10/16/12 → SEE ATTACHED ~~ITEMS~~ MEMO REGARDING OVERFILL PREVENTION

Init/Date JKR 10/09/12

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]			✓
		❑ Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] ❑ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)] ❑ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] ❑ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	✓		
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]	✓		
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]	✓		
		❑ UST system (Choose one) ❑ UST in operation ❑ UST in temporary closure ❑ CP System is properly operated and maintained ❑ CP system is performing adequately based on results of testing. [280.31(b)]; - or - ❑ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]		✓	
		☐ Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected. For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]: ☐ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)] ☑ Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)] ☐ Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)] For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: ☐ Tank and piping meet new UST requirements [280.21(a)(1)] ☐ Steel tank is internally lined. [280.21 (b)] ☐ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A - Indicates that the measure is not applicable.
Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Release Detection Compliance Measures Matrix

Instructions - To Determine Compliance Status of Measures #1-7,
Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance? N/A	Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		✓	
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		✓	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	✓		
		☐ Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]			✓
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	✓		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]	✓		

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☐			**A. Inventory Control with Tank Tightness Testing (T.T.T)** ☐ Inventory control is conducted properly. ☐ T.T.T. performed as required (See "D" below). ☐ Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] ☐ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] ☐ Water is monitored at least monthly. [280.43(a)(6)]

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank (Choose one)	**Pressurized Pipe** (Choose Two)	**Non-exempt Suction Pipe** (Choose one)	**Release Detection Method**
☐			**B. Automatic Tank Gauge (ATG)** ☐ ATG is set up properly. [280.40(a)(2)] ☑ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
☐			**C. Manual Tank Gauging (MTG)** ☐ Tank size is appropriate for using MTG. [280.43(b)(5)] ☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐ Method is being conducted correctly. [280.43(b)(4)] ☐ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
☐	☑	☐	**D. Tightness Testing** (Safe Suction piping does not require testing) ☐ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] ☑ Tightness testing is conducted within specified time frames for method: ☐ **Tanks** - every 5 years [280.41(a)(1)] ☑ **Pressurized Piping** - annually [280.41(b)(1)(ii)] ☐ **Non-exempt suction piping** - every 3 years [280.41(b)(2)] ☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
☐	☐	☐	**E. Ground Water or Vapor Monitoring** ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐ Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐ Wells are properly designed and positioned. [280.43(c)(6), 280.43(f)(7)]
☐	☐	☐	**F. Interstitial Monitoring** ☐ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ☐ Sensor properly positioned. [280.40(a)(2)]

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank (Choose one)	**Pressurized Pipe** (Choose Two)	**Non-exempt Suction Pipe** (Choose one)	**Release Detection Method**
	☑		**G. Automatic Line Leak Detector (ALLD)** ☐ ALLD is present and operational. [280.44(a)] ☑ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
☐	☐	☐	**H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]** ☐ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or ☐ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)] ☐ S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

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United States Environmental Protection Agency (EPA)
Region 2
290 Broadway
New York, NY 10007-1866
Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): JEFF BLAIR **DATE:** 05/19/15

SIC CODE: **ICIS #:**

I. Location of Tank(s) ☐ Tribal	**II. Ownership of Tank(s)** ☐ same as location (I.)
Facility Name: SITE # 39847	Owner Name: NJ ENERGY CORP.
Street Address: 470 ROUTE 1N + CRAIG	Street Address: 536 MAIN STREET
City: EDISON, State: NY, Zip Code: 08817	City: NEW PALTZ, State: NY, Zip Code: 12561
County: MIDDLESEX	County:
Phone Number: (732) 640-1778, Fax Number:	Phone Number: (845) 256-0162, Fax Number:
Contact Person(s): EDGAR AMADOR, ENV. COMP. SPECIALIST	Contact Person(s): SCOTT PARKER, DIRECTOR OF

IIA. Ownership of Other Facilities

☐Do you own other UST Facilities (Yes) / No

If Yes, How many Facilities 210 How many USTs 698

III. Notification

☐ Notification to implementing agency; name NJ DEP (EFFECTIVE THROUGH 03/31/16)

State Facility ID # NJ 02235

IV. Financial Responsibility TOKIO MARINE SPECIALTY INS. CO. (EXPIRES 03/13/16)

☐ State Fund		☑ Private Insurance: Insurer/Policy # PHPK1147480
☐ Guarantee	☐ Surety Bond	☐ Letter of Credit
☐ Local Government	☐ Self Insured	☐ **Not Required** (Federal & State government, hazardous substance USTs)

V. Release History

N/A ☑

☐ To your knowledge, are there any public or private Drinking Water Wells in the vicinity ? Yes / (No)

☐ Evidence of release or spills at facility	☐ Greater than 25 gallons (estimate)
☐ **Releases reported to implementing agency; if so, date(s)** _____ [280.53]	
☐ Release confirmed; when and how _____	
☐ Initial abatement measures and site characterization	☐ Free product removal
☐ Soil or ground water contamination	☐ Corrective action plan submitted
☐ Remediation ongoing	☐ Remediation completed, no further action; date(s) _____

Notes:

Init/Date JKS 05/19/15

VI. Tank Information — Tank No.	E001	E002	E003			
Tank presently in use	YES →	→	→			
If not, date last used (see Section XII)						
If empty, verify 1" or less left (see Section XII)						
Capacity of Tank (gal)	12,000G →	→	→			
Substance Stored	REG GAS	MID GAS	PRE GAS			
M/Y Tank installed/ Upgraded	01/91 →	→	→			
Tank Construction: Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)	DW FRP →	→	→			
Spill Prevention	SPILL BUCKETS →	→	→			
Overfill Prevention (specify type)	BALL FLOAT VALVES →	→	→			
Special Configuration: Compartmentalized , Manifolded	NO →	→	→			

VII. Piping Information

Piping Type: Pressure, Suction	PRESSURE →	→	→			
Piping Construction: Bare steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW)	DW FLEX →	→	→			

Tank and Piping Notes:

VIII. Cathodic Protection

N/A ☑

Integrity Assessment conducted prior to upgrade							
Interior Lining:	Interior lining inspected						
Impressed Current	CP Test records						
	Rectifier inspection records						
Sacrifical Anode:	CP test records	↓	↓	↓			

CP Notes: /

Tank No.	E001	E002	E003			
IX. UST system used solely by Emergency Power Generator	NO →		→			

X. Release Detection N/A ☐

Tank RD Methods	ATG						
	Interstitial Monitoring	YES →		→			
	Groundwater Monitoring						
	Vapor Monitoring						
	Inventory Control w/ TTT						
	Manual Tank Gauging						
	Manual Tank Gauging w/ TTT						
	SIR						
12 Months Monitoring Records (*Must* Make Available Last 12 Months For Compliance)		YES →		→			

Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED TWELVE PREVIOUS MONTHS OF PASSING ELECTRONIC INTERSTITIAL RESULTS TANK MONITOR → SIMPLICITY (VEEDER ROOT)

Pressurized Piping RD Methods		N/A ☐					
	Interstitial Monitoring						
	Groundwater Monitoring						
	Vapor Monitoring						
	SIR						
12 Months Monitoring Records							
USING ELLD ~~ALLD~~	Annual Line Tightness Test	YES →		→			
	Present	YES →		→			
	Annual Test	YES →		→			

Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED PASSING LINE AND LEAK DETECTOR TEST RESULTS (TEST DATE → 04/09/15)

NJ 022 35

XI. Repairs

N/A ☑

Repaired tanks and piping are tightness tested within 30 days of repair completion	Y ☐ N ☐ Unknown ☐
CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system	Y ☐ N ☐ Unknown ☐
Records of repairs are maintained	Y ☐ N ☐ Unknown ☐

XII. Temporary Closure

N/A ☑

CP continues to be maintained	Y ☐ N ☐ Unknown ☐
UST system contains product and release detection is performed	Y ☐ N ☐ Unknown ☐
Cap and secure all lines, pumps, manways	Y ☐ N ☐ Unknown ☐

Notes:

NJ022135

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST PROGRAM
Underground Storage Tank Team
New York, NY 10007-1866

Facility Name	SITE # 39847
Address	420 RTE 1N + CRAIG, EDISON
UST Reg #	NJ 022135

Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

☑ No violations observed at the conclusion of this inspection.

☐ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Potential Violations Observed:

Regulatory Citation	Violation Description
§	
§	
§	
§	
§	
§	
§	
§	

Actions Taken:
☐ Field Citation; # _____ ☐ Additional information required ☐ On-site request/Due date _____

Comments/Recommendations:

Name of Owner/Operator Representative:

Edgar Arnaldo
(Please print)

(Signature)

Other Participants: _____

Name of EPA Inspector/representative

JEFFREY K. BLAIR
(Please print)

Jeffrey K Blair
(Signature)

(Credential Number)

Date of Inspection 05/19/15 Time 12:40 AM/PM

Init/Date JKB 05/19/15

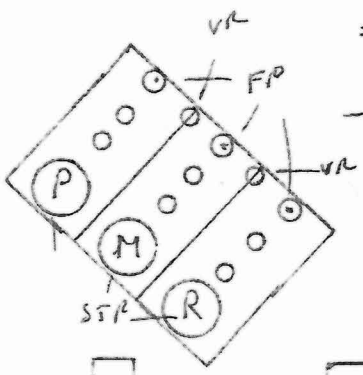
TN 022185

SITE DRAWING

DATE: 05/19/15 TIME ON SITE: 10:10 AM TIME OFF SITE: 10:40 AM

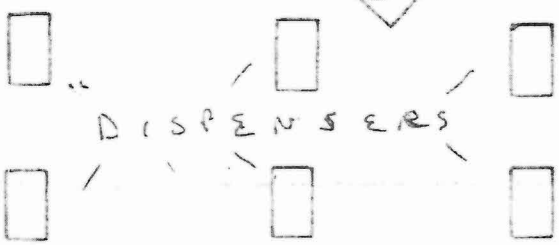
WEATHER: 70° + OVERCAST

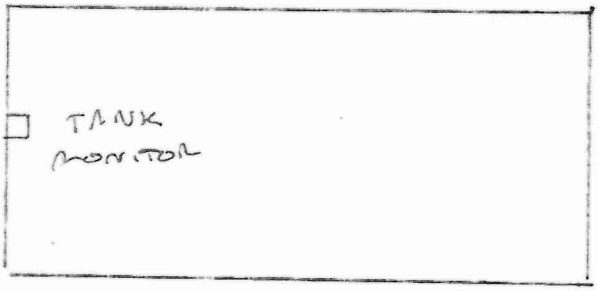
ENVIRONMENTALLY SENSITIVE AREA : Y☐ N☑
If "Yes", please describe:



GPS TOP USTS:

40.50654'N
-74.39259'W





PHOTOS

212 FP
213 STP
214 FP
215 STP
216 FP
217 STP
218 FUEL PAD
219 INSIDE DISPENSER
220 TANK MONITOR
221 SITE

☑ Pictures

Init/Date JKB 05/19/15

NT022135

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection? No

Deficiencies observed: (Put an **X** for each observed deficiency)

___ Potential failure to complete or submit a notification, report, certification, or manifest

___ Potential failure to follow or develop a required management practice or procedure

___ Potential failure to maintain a record or failure to disclose a document

___ Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

___ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? **Yes / No**

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? **Yes / No**

If yes, what actions were taken?

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? **Yes / No**

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? **Yes / No**

Init/Date JKS 05/19/15

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		✓	
		☐ Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] ☐ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)] ☐ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] ☑ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	✓		
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]	✓		
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]	✓		
		☐ UST system (Choose one) ☐ UST in operation ☐ UST in temporary closure ☐ CP System is properly operated and maintained ☐ CP system is performing adequately based on results of testing. [280.31(b)]; - or - ☐ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance? N/A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]		✓	
		☐ Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected.			
		For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]:			
		☐ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)]			
		☑ Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)]			
		☐ Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)]			
		For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: ☐			
		Tank and piping meet new UST requirements [280.21(a)(1)]			
		☐ Steel tank is internally lined. [280.21 (b)]			
		☐ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A - Indicates that the measure is not applicable.
Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

NJ 22135

Release Detection Compliance Measures Matrix

Instructions - To Determine Compliance Status of Measures #1-7, Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance? N/A	Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		✓	
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		✓	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	✓		
		❑ Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]		✓	
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	✓		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]	✓		

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
❑			**A. Inventory Control with Tank Tightness Testing (T.T.T)** ❑ Inventory control is conducted properly. ❑ T.T.T. performed as required (See "D" below). ❑ Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] ❑ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] ❑ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] ❑ Water is monitored at least monthly. [280.43(a)(6)]

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☐			**B. Automatic Tank Gauge (ATG)** ☐ ATG is set up properly. [280.40(a)(2)] ☐ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
☐			**C. Manual Tank Gauging (MTG)** ☐ Tank size is appropriate for using MTG. [280.43(b)(5)] ☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐ Method is being conducted correctly. [280.43(b)(4)] ☐ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
☐	☑	☐	**D. Tightness Testing** (Safe Suction piping does not require testing) ☐ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] ☑ Tightness testing is conducted within specified time frames for method: ☐ **Tanks** - every 5 years [280.41(a)(1)] ☑ **Pressurized Piping** - annually [280.41(b)(1)(ii)] ☐ **Non-exempt suction piping** - every 3 years [280.41(b)(2)] ☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
☐	☐	☐	**E. Ground Water or Vapor Monitoring** ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐ ~~Vapor monitoring well is not affected by high ground water. [280.43(e)(3)]~~ ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐ Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
☑	☐	☐	**F. Interstitial Monitoring** ☑ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ☐ Sensor properly positioned. [280.40(a)(2)]

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Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
	☑		**G. Automatic Line Leak Detector (ALLD)** USING ELLD ☑ ALLD is present and operational. [280.44(a)] ☑ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
☐	☐	☐	**H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]** ☐ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or ☐ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)] ☐ S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

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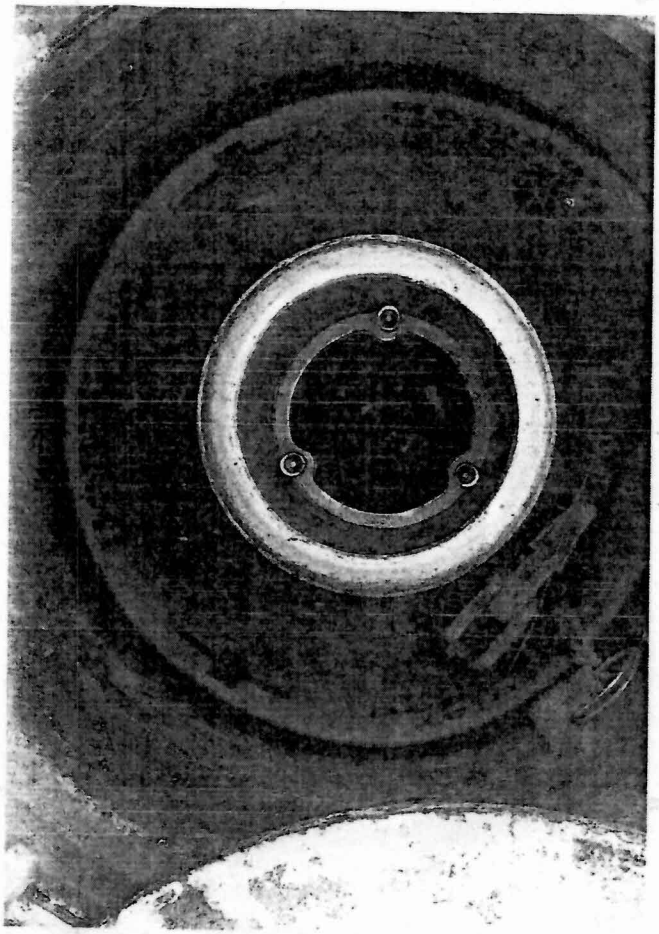

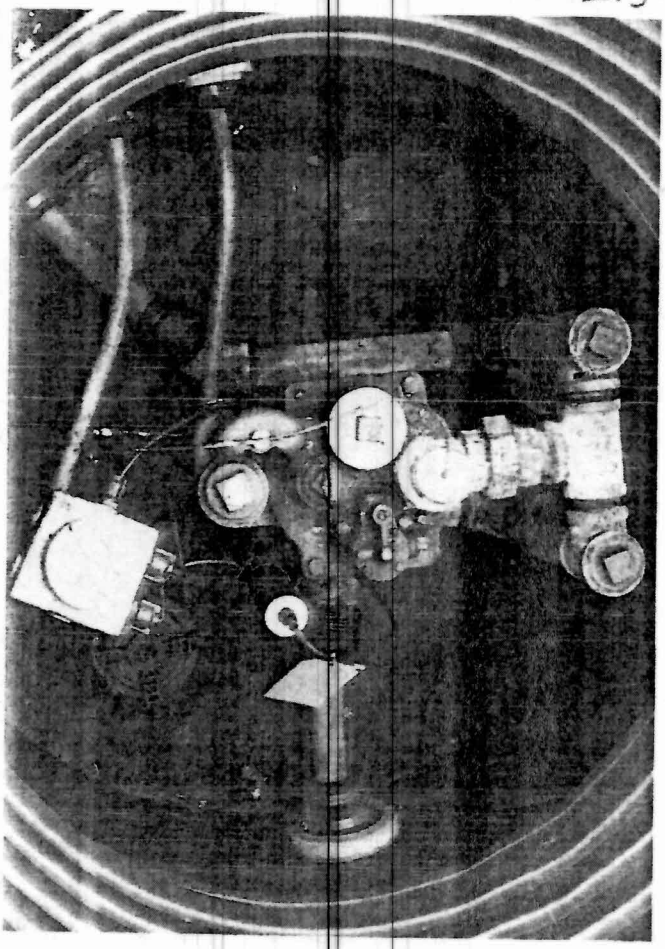

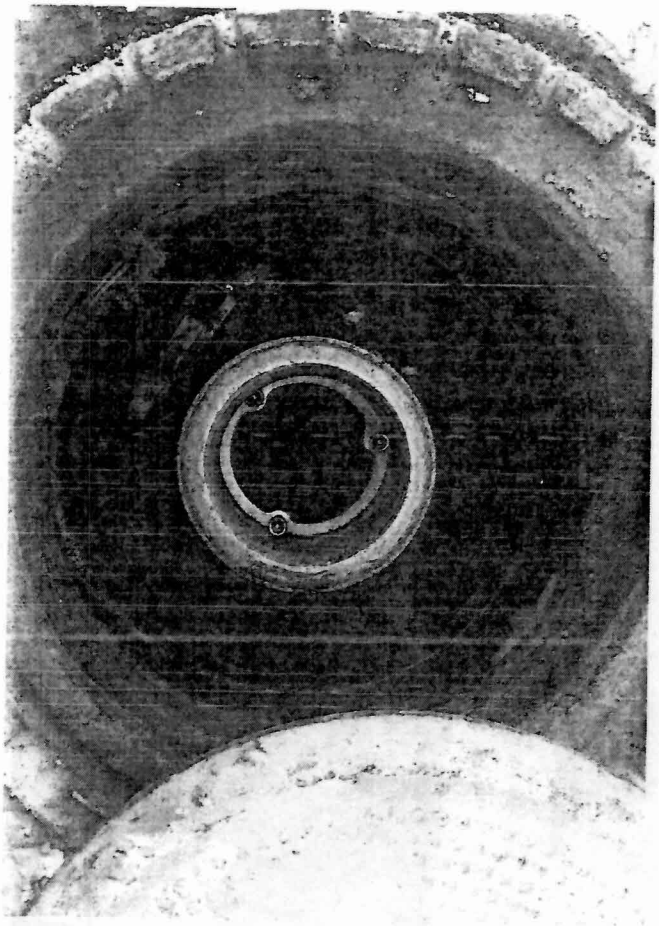

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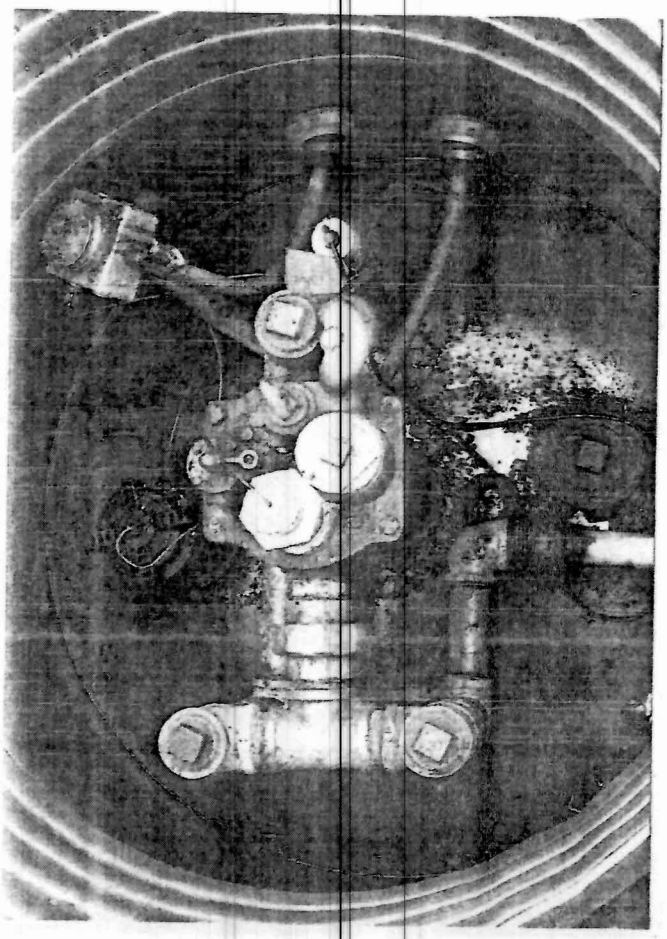

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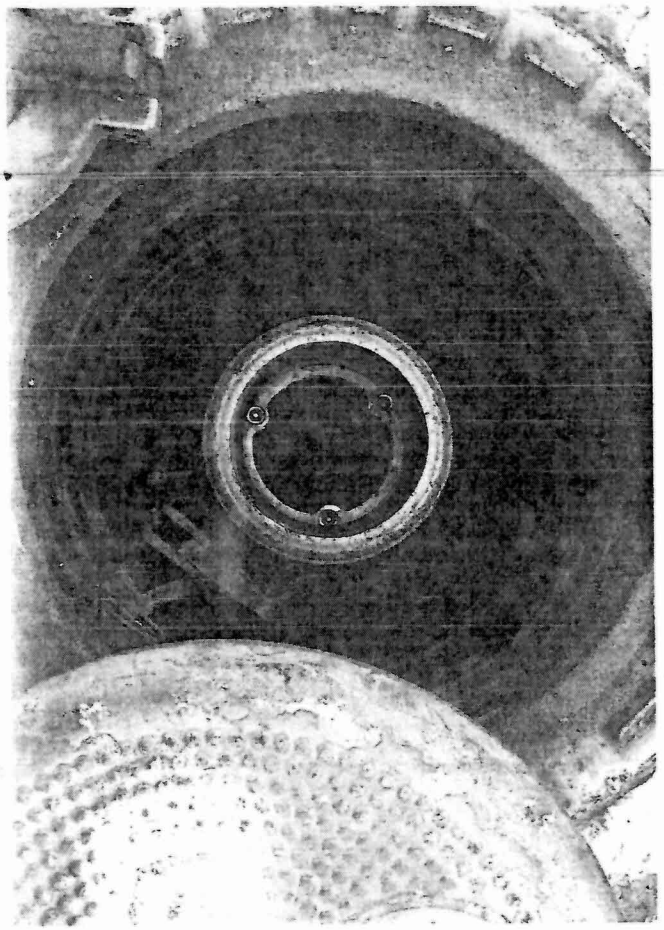

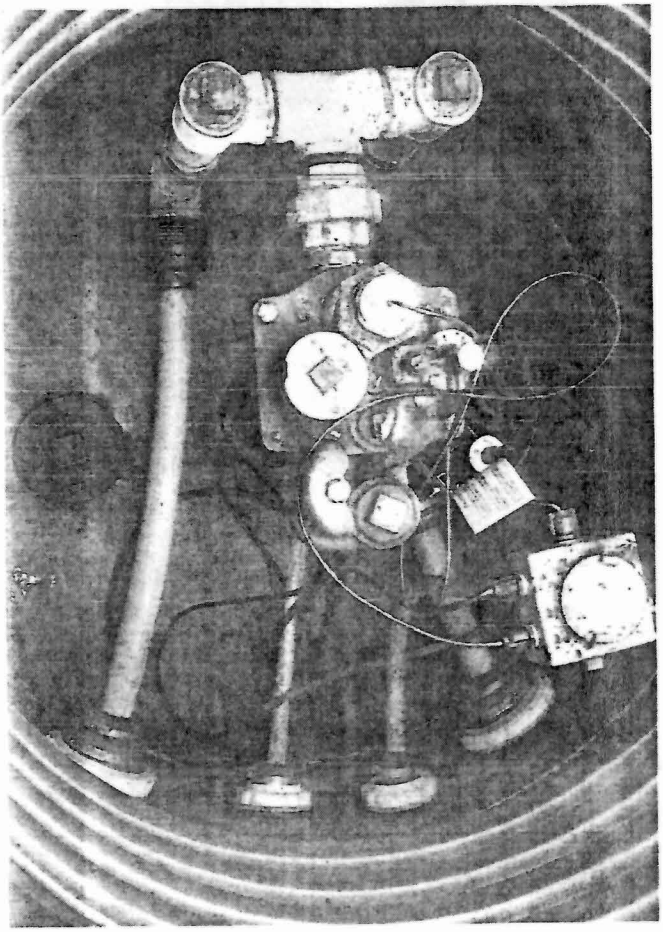

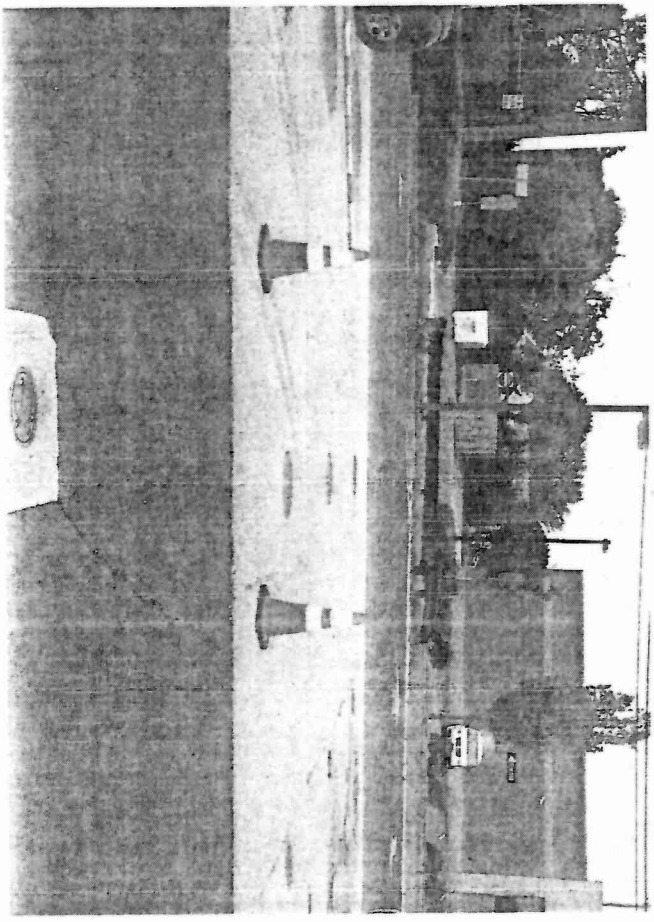

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United States Environmental Protection Agency (EPA)
Region 2
290 Broadway
New York, NY 10007-1866

Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): JEFF BLAIR **DATE:** 10/03/12

SIC CODE: **ICIS #:**

I. Location of Tank(s) ☐ Tribal

Facility Name: NJ ENERGY CORP. # 39847
Street Address: 420 ROUTE 1 NORTH + CRAIG
City: EDISON TWP, State: NJ Zip Code: 08817
County: MIDDLESEX
Phone Number: (732) 640-1778 Fax Number:
Contact Person(s): EDGAR AMADOR, ENV. COMP. SPECIALIST

II. Ownership of Tank(s) ☐ same as location (I.)

Owner Name: NJ. ENERGY CORP.
Street Address: 536 MAIN STREET
City: NEW PALTZ, State: NY Zip Code: 12561
County:
Phone Number: (845) 256-0162 Fax Number:
Contact Person(s): SCOTT PARKER, DIRECTOR - FACILITIES

IIA. Ownership of Other Facilities

☐Do you own other UST Facilities (Yes) / No

If Yes, How many Facilities 34 How many USTs 112

III. Notification

☐ Notification to implementing agency; name NJ DEP (EFFECTIVE THROUGH 03/31/15)
State Facility ID # 022135

IV. Financial Responsibility CHARTER SPECIALTY INSURANCE CO.

☐ State Fund ☐ Private Insurance: Insurer/Policy # ST 534-4283
☐ Guarantee ☐ Surety Bond ☐ Letter of Credit
☐ Local Government ☐ Self Insured ☐ **Not Required** (Federal & State government, hazardous substance USTs)

V. Release History N/A ☐

☐ To your knowledge, are there any public or private Drinking Water Wells in the vicinity ? **Yes / No**

☐ Evidence of release or spills at facility ☐ Greater than 25 gallons (estimate)
☐ **Releases reported to implementing agency; if so, date(s)** _____ [280.53]
☐ Release confirmed; when and how _____
☐ Initial abatement measures and site characterization ☐ Free product removal
☐ Soil or ground water contamination ☐ Corrective action plan submitted
☐ Remediation ongoing ☐ Remediation completed, no further action; date(s) _____

Notes:

022155

VI. Tank Information	Tank No.	E001	E002	E003			
Tank presently in use		YES →	→	→			
If not, date last used	(see Section XII)						
If empty, verify 1" or less left	(see Section XII)						
Capacity of Tank (gal)		12000G →	→	→			
Substance Stored		GASOLINE →	→	→			
M/Y Tank installed/ Upgraded		01/91 →	→	→			
Tank Construction : Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)		DW FRP →	→	→			
Spill Prevention		SPILL BUCKETS →	→	→			
Overfill Prevention (specify type)		*NO* →	→	→			
Special Configuration: Compartmentalized , Manifolded		NO →	→	→			

VII. Piping Information

Piping Type : Pressure, Suction	PRESSURE →	→	→			
Piping Construction: Bare steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW)	DW FLEXIBLE PIPING →	→	→			

Tank and Piping Notes:

NO VERIFICATION OF OVERFILL PREVENTION DEVICE(S)

COMMENT ADDED 10/15/12 → (SEE ATTACHED MEMO REGARDING OVERFILL PREVENTION)

VIII. Cathodic Protection

N/A ☐

Integrity Assessment conducted prior to upgrade							
Interior Lining:	Interior lining inspected						
Impressed Current	CP Test records						
	Rectifier inspection records						
Sacrifical Anode:	CP test records	↓	↓	↓			

CP Notes:

Init/Date JKB 10/03/12

Tank No.	E001	E002	E003				
IX. UST system used solely by Emergency Power Generator	NO →		→				

X. Release Detection N/A ☐

Tank RD Methods	ATG	YES	YES →					
	Interstitial Monitoring							
	Groundwater Monitoring							
	Vapor Monitoring							
	Inventory Control w/ TTT							
	Manual Tank Gauging							
	Manual Tank Gauging w/ TTT							
	SIR							
12 Months Monitoring Records (*Must* Make Available Last 12 Months For Compliance)		* NO *	→					

Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED 1/12 PREVIOUS MONTHS OF PASSING ATG RESULTS (SEPTEMBER 2012)

TANK MONITOR → SIMPLICITY

Pressurized Piping RD Methods		N/A ☐						
	Interstitial Monitoring							
	Groundwater Monitoring							
	Vapor Monitoring							
	SIR							
12 Months Monitoring Records								
	Annual Line Tightness Test	YES →						
ALLD	Present	YES →						
	Annual Test	YES →						

Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED PASSING LEAK DETECTOR AND PRESSURIZED LINE TEST RESULTS

(TEST DATE → 04/13/12)

XI. Repairs

N/A ☑

Repaired tanks and piping are tightness tested within 30 days of repair completion	Y ☐ N ☐ Unknown ☐
CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system	Y ☐ N ☐ Unknown ☐
Records of repairs are maintained	Y ☐ N ☐ Unknown ☐

XII. Temporary Closure

N/A ☐

CP continues to be maintained	Y ☐ N ☐ Unknown ☐
UST system contains product and release detection is performed	Y ☐ N ☐ Unknown ☐
Cap and secure all lines, pumps, manways	Y ☐ N ☐ Unknown ☐

Notes:

Init/Date _____ 11/04/2010

02135

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST PROGRAM
Ground Water Compliance Section
New York, NY 10007-1866

Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

☐ No violations observed at the conclusion of this inspection.

☐ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Violations Observed:

Regulatory Citation	Violation Description
§ 280.45	FAILURE TO MAINTAIN RECORDS OF RELEASE DETECTION
§	MONITORING
§	
§ 280.20(c)	FAILURE TO USE AN OVERFILL PREVENTION SYSTEM
§	
§	
§	
§	

Actions Taken:
☐ Field Citation; # _____ ☐ Additional information required ☐ On-site request/Due date _____

Comments/Recommendations:

- PROVIDED OWNER 1/12 PREVIOUS MONTHS OF TANK RELEASE DETECTION RESULTS

- NO VERIFICATION OF OVERFILL PREVENTION SYSTEM

Name of Owner/Operator Representative:

Edgar Amador
(Please print)

(Signature)

Other Participants: _____

Name of EPA Inspector/representative

JEFFREY K BLAIR
(Please print)

(Signature)

(Credential Number)

Date of Inspection 10/05/12 Time 10:45 AM/PM

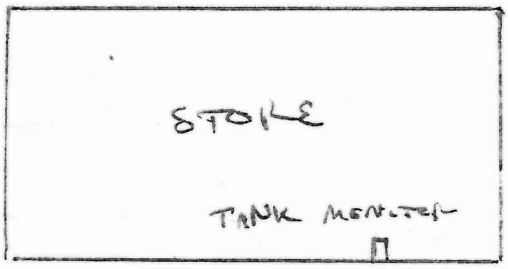
Init/Date JKB 10/05/12

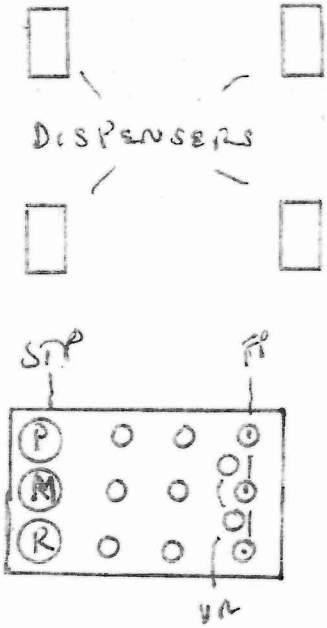
SITE DRAWING

DATE: 10/08/12 TIME ON SITE: 10:20 AM TIME OFF SITE: 10:45 AM

WEATHER: 70° + OVERCAST

ENVIRONMENTALLY SENSITIVE AREA : Y ☐ N ☑
If "Yes", please describe:





PHOTOS

041 FP REG
042 STP REG
043 FP MID
044 STP MID
045 FP PRE
046 STP PRE
047 FUEL PAD
048 SITE
049 TANK MONITOR

☑ Pictures

Init/Date JKB 10/08/12

32-195

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection? YES

Deficiencies observed: (Put an **X** for each observed deficiency)

___ Potential failure to complete or submit a notification, report, certification, or manifest

__X__ Potential failure to follow or develop a required management practice or procedure

___ Potential failure to maintain a record or failure to disclose a document

__X__ Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

___ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? (Yes) / No

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? (Yes) / No

If yes, what actions were taken? (2) WILL FORWARD OVERFILL PREVENTION CERTIFICATION

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? (Yes) / No

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? (Yes) / No

COMMENT ADDED 10/15/12 → SEE ATTACHED MEMO REGARDING OVERFILL PREVENTION

Init/Date JCB 10/03/12

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]			✓
		❑ Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] ❑ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)] ❑ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] ❑ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	✓		
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]	✓		
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]	✓		
		❑ UST system (Choose one) ❑ UST in operation ❑ UST in temporary closure ❑ CP System is properly operated and maintained ❑ CP system is performing adequately based on results of testing. [280.31(b)]; - or - ❑ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
IV. Tank and Piping Corrosion Protection	8	~~Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected.~~ [280.20(a), 280.20(b), 280.21(b), 280.21(c)]		✓	
		☐ Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected. For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]: ☐ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)] ☑ Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)] ☐ Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)] For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: ☐ Tank and piping meet new UST requirements [280.21(a)(1)] ☐ Steel tank is internally lined. [280.21 (b)] ☐ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A - Indicates that the measure is not applicable.
Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Release Detection Compliance Measures Matrix

Instructions - To Determine Compliance Status of Measures #1-7,
Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance?		
			N/A	Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		✓	
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		✓	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	✓		
		❑ Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]			✓
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	✓		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]	✓		

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
❑			**A. Inventory Control with Tank Tightness Testing (T.T.T)** ❑ Inventory control is conducted properly. ❑ T.T.T. performed as required (See "D" below). ❑ Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] ❑ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] ❑ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] ❑ Water is monitored at least monthly. [280.43(a)(6)]

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☐			**B. Automatic Tank Gauge (ATG)** ☐ ATG is set up properly. [280.40(a)(2)] ☑ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
☐			**C. Manual Tank Gauging (MTG)** ☐ Tank size is appropriate for using MTG. [280.43(b)(5)] ☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐ Method is being conducted correctly. [280.43(b)(4)] ☐ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
☐	☑	☐	**D. Tightness Testing** (Safe Suction piping does not require testing) ☐ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] ☑ Tightness testing is conducted within specified time frames for method: ☐ **Tanks** - every 5 years [280.41(a)(1)] ☑ **Pressurized Piping** - annually [280.41(b)(1)(ii)] ☐ **Non-exempt suction piping** - every 3 years [280.41(b)(2)] ☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
☐	☐	☐	**E. Ground Water or Vapor Monitoring** ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐ Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐ Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
☐	☐	☐	**F. Interstitial Monitoring** ☐ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ☐ Sensor properly positioned. [280.40(a)(2)]

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
	☑		**G. Automatic Line Leak Detector (ALLD)** ☐ ALLD is present and operational. [280.44(a)] ☑ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
☐	☐	☐	**H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]** ☐ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or ☐ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)] ☐ S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

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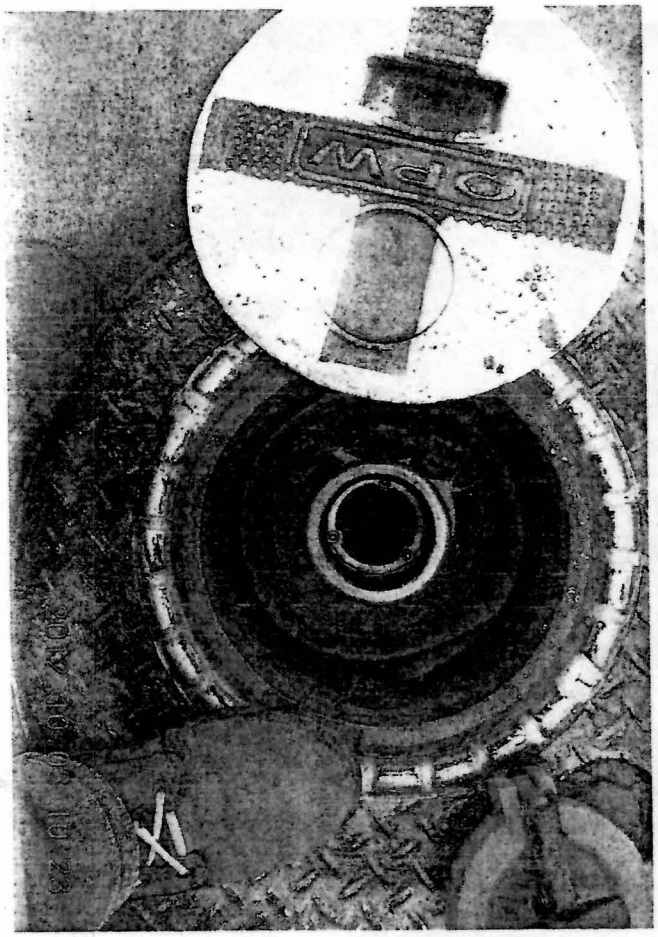

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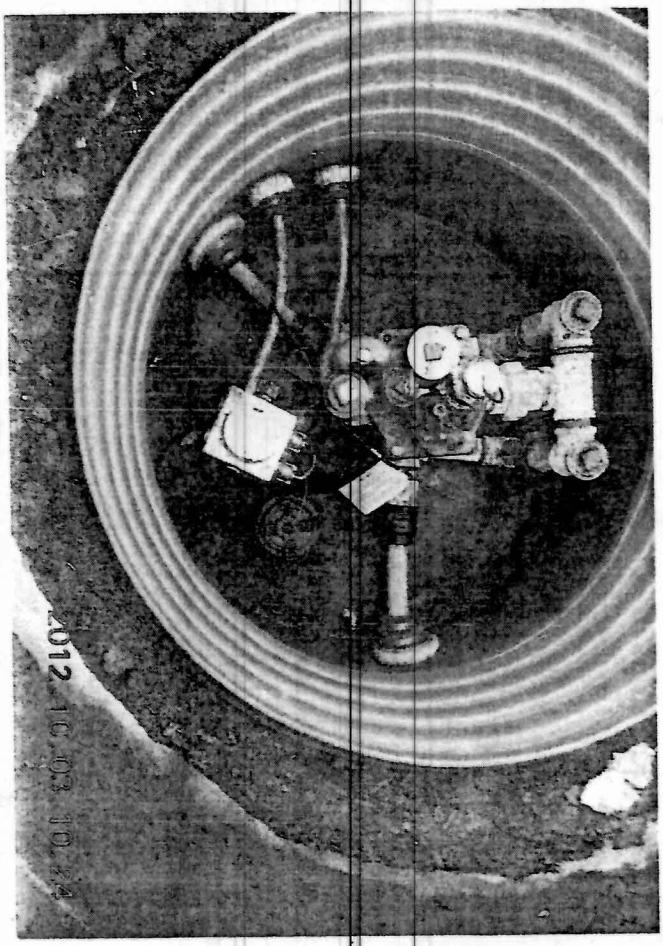

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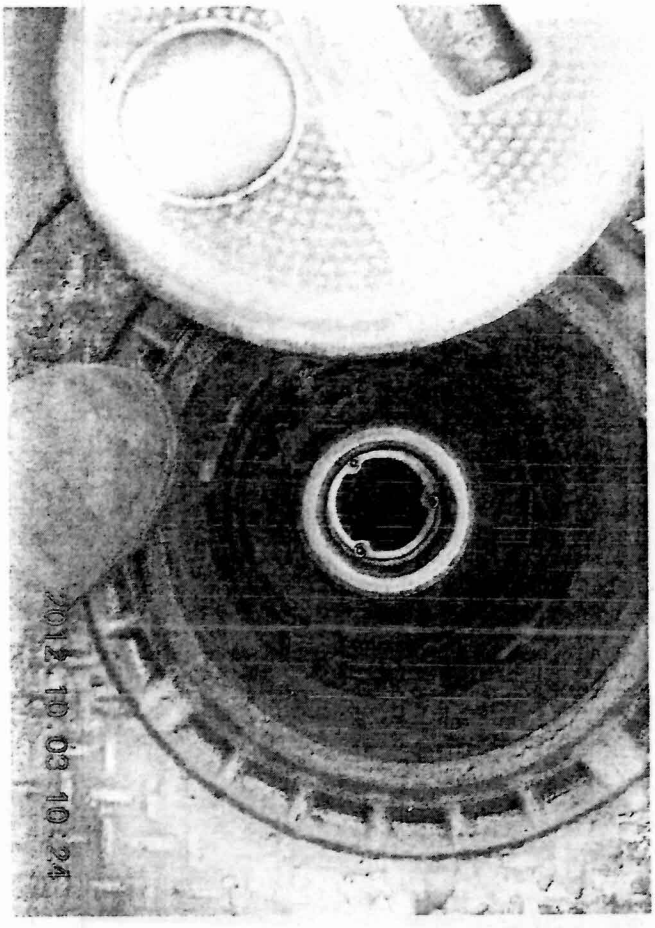

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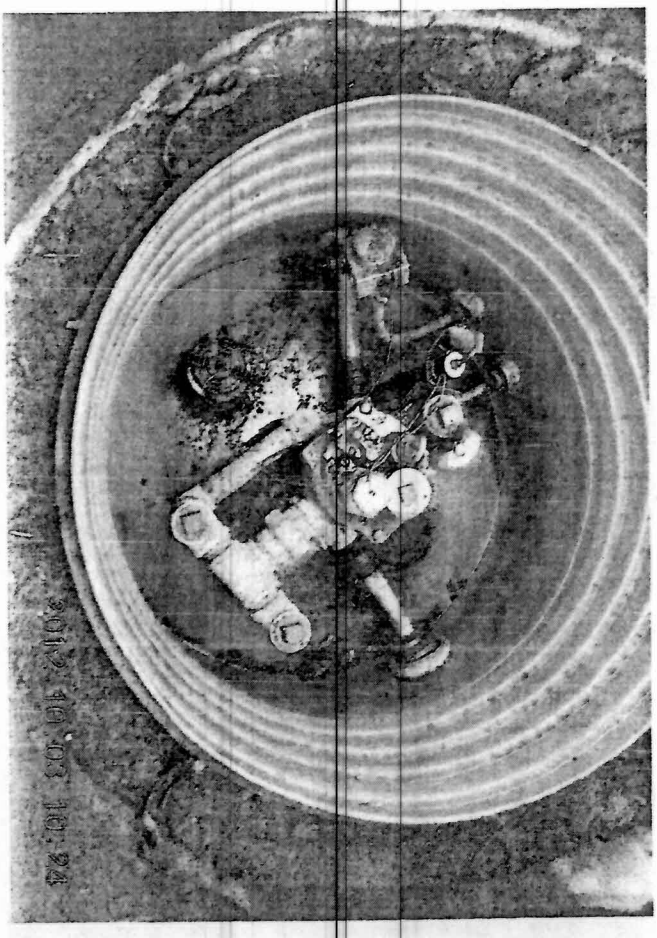

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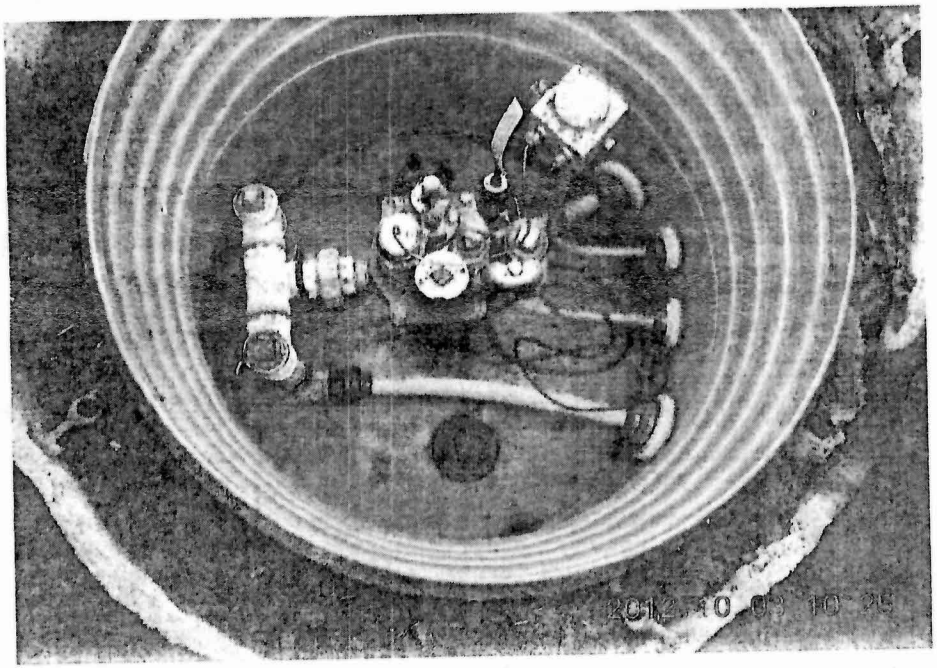
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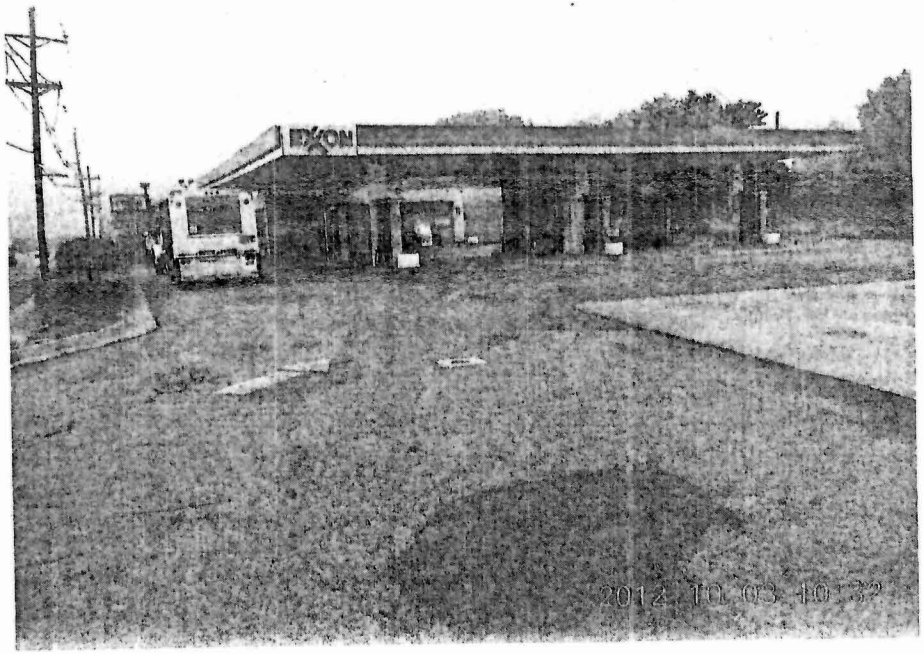
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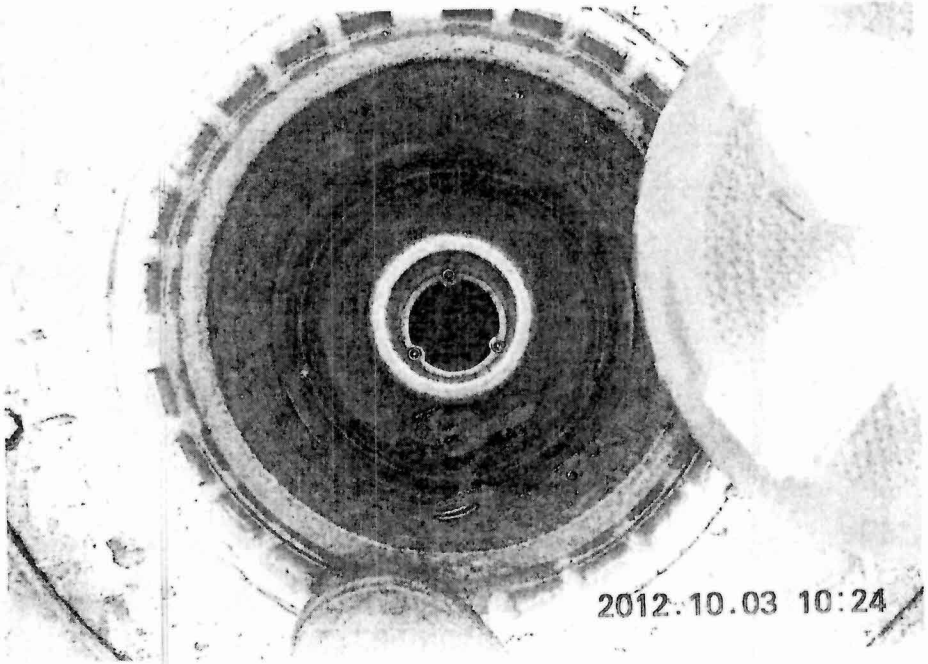
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SIMPLICITY
Property of VEEDER-ROOT
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